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14 *Attorneys for Intervenor Claimant*
15 *Lucas E. Buckley as Trustee of the*
16 *Gox Victim Bitcoin Trust*

17 THE UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 UNITED STATES OF AMERICA,

21 Plaintiff,

22 v.

23 Approximately 69,370 Bitcoin (BTC), Bitcoin
24 Gold (BTG), Bitcoin SV (BSV), and Bitcoin
25 Cash (BCH) seized from
26 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx,

27 Defendant,

28 Lucas E. Buckley, as Trustee of the
Gox Victim Bitcoin Trust,

STIPULATION AND [PROPOSED] ORDER

Case No. 20-7811 RS

HON. RICHARD SEEBORG
United States District Judge
Courtroom 3

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND TIME TO FILE
RESPONSIVE PLEADING TO
THE FIRST AMENDED
COMPLAINT FOR
FORFEITURE**

Case Filed: November 5, 2020
FAC Filed: November 20, 2020
Trial Date: TBD

1 COMES NOW Claimant Lucas E. Buckley, Esq., as Trustee of the Gox Victim Bitcoin
2 Trust, by and through counsel, to apply for 21-day extension of time to file an answer.

3 WHEREAS, on November 20, 2020, the united states filed an amended forfeiture
4 compliant, notice of which was published on November 27, 2020.

5 WHEREAS, on January 25, 2021, Claimant Buckley, as trustee of the Gox Victim Bitcoin
6 Trust, filed a verified claim and statement of interest.

7 WHEREAS, Claimant's answer is presently due on February 16, 2020.

8 WHEREAS, the complexity of this case and the complications caused by the ongoing
9 pandemic has necessitated Claimant Buckley to request this extension of time.

10 WHEREAS, this is the first extension requested by Claimant.

11 WHEREAS, extensions of time to submit a responsive pleading have also been requested
12 by claimants Roman Hossain and Ulbricht.

13 WHEREAS, this extension is sought in the interest of justice and not for delay, and no
14 party will be prejudiced if the extension is granted.

15 WHEREAS, no party opposes this request.

16 WHEREAS, the Plaintiff, the United States, consents to this request but does not concede
17 the validity of the form or substance of claimant's claim and reserves all rights to challenge said
18 claim on any and all available grounds.

19 NOW, THEREFORE, IT IS HEREBY REQUESTED that Claimant Buckley be granted a
20 21-day extension to file an answer.

21 Dated: February 16, 2021

22 **HECHT PARTNERS LLP**

23
24 By: /s/ Kathryn Lee Boyd _____
25 Maxim Price (pro hac vice pending)
Kathryn Lee Boyd (SBN 189496)
David L. Hecht (pro hac vice pending)
Alan Alvela (pro hac vice pending)

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27 *Attorneys for Intervenor Claimant*

28 STIPULATION AND [PROPOSED] ORDER

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*Lucas E. Buckley as Trustee of the
Gox Victim Bitcoin Trust*

Dated: February 16, 2021

UNITED STATES ATTORNEY'S OFFICE

By: /s/ David Countryman

David Countryman
Criminal Division, Asset Forfeiture
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Attorneys for United States of America

ATTESTATION: Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing
of this document has been obtained from David Countryman.

By: /s/ Kathryn Lee Boyd

Counsel for Claimant Lucas E. Buckley

STIPULATION AND [PROPOSED] ORDER

[PROPOSED] ORDER

It is hereby ORDERED and ADJUDGED that Claimant be given a 21-day extension to file an answer.

SO ORDERED.

Dated:

HON. RICHARD SEEBORG
United States District Judge